

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 4:16CR471 RWS
v.)	
)	
TAMARA JONES,)	
)	
Defendant.)	

RESPONSE TO MOTION TO WITHDRAW PLEA

COMES NOW the United States of America, by and through Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and responds to the Motion to Withdraw Guilty Plea filed by the Defendant as follows.

As stated in the Defendant's motion, the government does not object to Defendant's motion. To be clear, it is doing so as a courtesy to the Defendant. There is no legal basis for Defendant to withdraw her plea under Rule 11(d)(2) other than that Defendant has requested the withdrawal. The government promptly turned over all discoverable material to Defendant and has complied with every order of the court and every rule of procedure in prosecuting this case.

The government has also consented to Defendant's requests for additional hearings and meetings beyond what is required by the rules and customs of this Court. Defendant did not suggest any basis for withdrawing her plea during the hearing she requested on September 25, 2017 and which is cited in her Motion to Withdraw. To the contrary, the Defendant adamantly persisted in her desire not to withdraw her plea at that time. To only complaint raised by Defendant relating to her case was that the government should have referred her case to a diversion court which it did not do. At no time has Defendant professed herself to be innocent of the charges.

In the present case, the government will not be prejudiced by the granting of Defendant's motion to withdraw and stands ready and willing to prove her guilt beyond a reasonable doubt. To the extent the Defendant feels proceeding to trial is preferable to pleading guilty, the government asks the Court to vindicate that desire and grant her motion.

Respectfully submitted,

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